



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10

1200 Sixth Avenue
Seattle, Washington 98101

October 28, 2002

Reply to
Attn of: WCM-121

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Ward Wolleson
J.R. Simplot Company
999 Main Street, P.O. Box 72
Boise, Idaho 83702

Re: Eastern Michaud Flats Superfund Site Simplot Plant Area Pre-Final Remedial Design Report and Draft Remedial Action Work Plan for the Gypsum Stack Roads Dated August 1, 2002.

Dear Mr. Wolleson:

The Environmental Protection Agency has reviewed the Pre-Final Remedial Design Report and Draft Remedial Action Report Work Plan for the Gypsum Stack Roads. The detailed comments are provided in the attachment. The report must be revised to include ALL permanent and frequently used roads on the gypsum stack which includes the East and West Access Roads.

If you have any concerns regarding this requirement please contact me at (206)553-6636.

Sincerely,

Linda Meyer
Remedial Project Manager RCRA/Superfund

cc: Roger Turner, RCRA-CERCLA Program, Shoshone-Bannock Tribes
Doug Tanner, IDEQ
Alan Prouty, J.R. Simplot



PRE-FINAL REMEDIAL DESIGN REPORT AND
DRAFT REMEDIAL ACTION WORK PLAN
GYPSUM STACK ROADS
SIMPLOT PLANT AREA
EASTERN MICHAUD FLATS SUPERFUND SITE
August 1, 2002

GENERAL COMMENTS:

1. The purpose of the remedial action is to reduce fugitive dust emissions resulting from vehicle traffic on the gypsum stack roads. The Record of Decision (ROD) and Consent Decree (CD) require paving the permanent roads on the face of the gypsum stack. Neither the ROD or the CD delineate which roads are defined as permanent roads or distinguish the face of the gypsum stack. The objective of this action is to reduce emissions from the areas frequently used but not to impose these requirements for areas that won't be useable in the relatively near future. For all roads that are considered temporary you must provide the date these roads will be taken out of service. Further, the document must provide detail regarding vehicle traffic patterns, loads, and vehicle count. The document must be revised to include paving all roads frequently used for accessing the gypsum stack and must include the East and West Access Roads.
2. The document must be revised to provide the design basis and performance standards for the proposed work. The document must be revised to include the criteria for the geotextile selection and rationale for the depth of gravel selected.

SPECIFIC COMMENTS:

3. **Section 2.1, Second Paragraph.** This paragraph describes the motor vehicle equipment accessing the Gypsum Stack including maintenance and refueling vehicles, wheeled vehicles, and tracked equipment. However, there is little statistical information provided such as the number of vehicles traveling the road, and the number of trips each vehicle makes on which specific roads over the course of a year. The weights of the vehicles and the overall traffic load are also necessary information to properly evaluate whether the road construction standards are adequate. This information must be provided in order to properly evaluate the adequacy of the proposed road.
4. **Section 2.1, Third Paragraph.** The document states that the East and West Access Roads were not considered for paving as they are not located on the face of the stack. The document must be revised in accordance with general comment number 2..
5. **Section 3.2.** The document does not provide any geotechnical data on the Gypsum Stack material such as its cohesion or bearing capacity. This information is essential in order to properly evaluate road preparation requirements.

6. **Section 3.3.** The document does not provide specifications on the geotextile material to be utilized except that it will be non-woven, and will have a minimum weight of eight ounces per square yard. Although it is appropriate to utilize a non-woven material, the geotextile material should have established specifications for grab strength, puncture strength, and burst strength dependent on the road construction needs, the geotechnical data, and the expected traffic load. Furthermore, the geotextile material should be evaluated for performance in cold weather, as these conditions can make some geotextiles brittle and more easily degradeable.
7. **Section 3.3.** The proposal to overlap the geotextile material by three feet is not a standard method of connecting geotextiles in road construction. It is a more common and effective practice to join the panels by sewing, stapling, heat welding, tying, and/or gluing. One of these methods should be used in joining the panels for this remedial action to ensure the quality of the road construction base.
8. **Section 3.4.** The proposed depth of the road base is six inches. Although, this may be adequate, there is no basis for evaluating this proposed thickness due to the lack of traffic and geotechnical data. The basis for selecting an aggregate base of six inches must be included.